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April 15, 2024

## VIA ECF

Hon. Dora L. Irizarry United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: <u>United States v. Shlomo Patchiav</u> <u>Crim. Dkt. No. 1:23-cr-00099-(DLI)</u>

Dear Judge Irizarry:

I am the attorney for Mr. Shlomo Patchiav, the Defendant in the above-referenced case. The Defendant respectfully writes to request a modification of his release conditions during the upcoming Passover holiday. The first full day of the holiday will be Tuesday April 23, 2024, and shall conclude on April 30, 2024 after sundown. Mr. Patchiav respectfully requests modifications of his home confinement schedule so he may travel to and celebrate in the homes of his close family members and worship in their synagogues for Passover.

My client wants to celebrate Passover at the home of his mother Rina Fatkhiev, located at 118-18 Metropolitan Avenue Kew Gardens, NY 11415. Mr. Patchiav wants to go to his mother's home with his family on April 25 11am - 10pm; on April 27, 2024 from 11am - 6:30pm; and on April 30, 2024 from 11am - 10pm.

Mr. Patchiav is also seeking to attend services at <u>Ner Mordechai Congregation</u> located at 8233 Lefferts Blvd, Kew Gardens, NY 11415 which is walking distance from his mother's apartment on: April 25: 6:45pm- 8:45pm and April 30 - 6:00pm- 8:45pm.

My office contacted Pretrial Services Electronic Monitoring Unit Officer Christian Berzak and the assigned AUSA Lindsey Oken last week about this request. Officer Berzak informed me that his office had no objection to the modifications but required a Court Order. AUSA Lindsey Oken was also informed and deferred to Pre-Trial's decision.

In light of the position of Pre-Trial and the Government, I respectfully request that this Honorable Court grant this request and allow my client to keep the above-referenced Passover schedule for the 2024 Passover holiday.

Thank you.

Respectfully,

Michael L. Soshnick, Esq. Attorney for Defendant

Cc: AUSA Lindsey Oken